

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
(Northern Division)

CHELSEA GILLIAM, *et al.*,

*

Plaintiffs,

*

v.

*

Civil Action No. 1:23-cv-1047

DEPARTMENT OF PUBLIC SAFETY
& CORRECTIONAL SERVICES, *et al.*,

*

*

Defendants.

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PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY

On May 8, 2023, Tehum Healthcare Services, Inc. filed a suggestion of bankruptcy in the U.S. Bankruptcy Court for the Southern District of Texas. Defendant YesCare Corp., a subsidiary of Tehum, subsequently sought a nationwide injunction from the Bankruptcy Court that would terminate hundreds of meritorious cases by injured plaintiffs around the country, including this case. On June 11, 2025, YesCare filed a motion in this Court to stay all pending litigation unless the Bankruptcy Court issued an order allowing continued prosecution of the actions. On June 25, 2025, Plaintiffs submitted their opposition.

Plaintiffs now respectfully submit this Notice of Supplemental Authority to inform the Court that on August 7, 2025, the Bankruptcy Court issued an order denying Defendant YesCare's motion to enjoin plaintiffs from further prosecution of Plaintiffs' causes of action. *See* Ex. A. The Court held that, although YesCare claimed that all plaintiffs received notice of the bankruptcy proceedings and could have opted out of the release settlement to pursue individual recovery, the Plaintiffs in this action never received the release form and, in a chapter 11

bankruptcy plan, constructive notice does not allow for consensual third-party releases. *Id.* at 5. Furthermore, Plaintiffs, as third-party creditors, are constitutionally entitled to actual notice before a release of litigation claims. *Id.*

Defendant YesCare's motion, therefore, should be denied.

Dated: August 15, 2025

Respectfully submitted,

/s/

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